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Attorney for Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:

Chapter 11

Case No. **15-31519**

JINNIE JINHUEI CHANG CHAO

**DEBTORS SECOND UPDATED STATUS
CONFERENCE REPORT**

Debtor-in-Possession

**DECLARATION OF ONYINYE N. ANYAMA
AND ETHAN A. BALOGH IN SUPPORT
THEREOF**

Date: April 18, 2019
Time: 10:00 a.m.
Room: 17-450 Golden Gate Ave,
San Francisco, CA 94102

TO: THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor-in-possession, Jinnie Jinhuei Chang Chao (“Debtor”), by and through her attorney of record herein, Onyinye N. Anyama (“Debtors Counsel”) hereby respectfully files this Second Updated Case Status Conference Report, and sets forth the following facts therein:

INTRODUCTION/EVENTS LEADING TO BANKRUPTCY

Jinnie Jinhuei Chang Chao (the “debtor”) is an individual and residents of the state of California. Ms. Chao (real estate professional) experienced major decrease in her income. She

attempted to reorganize her debt by filing Chapter 13 cases in 2015 pro se. However the case was dismissed since Ms. Chao represented herself and was unsophisticated in bankruptcy matters. Ms. Chao employed Onyinye Anyama/Anyama Law Firm to file her Chapter 11 bankruptcy case to reorganize her debt.

Virtually all of the Debtor's assets are encumbered by holders of prior secured claims.

The principal assets of the estate are the following properties currently owned by the debtor.

- ***8108 Penobscot Ln. McKinney TX,***
- ***701 Braxton Ct. McKinney TX,***
- ***30 Pilarcitos Ct Hillsborough CA***
- ***305 St Andrews Dr. Pinehurst NC***
- ***9 Maverick Pl. Pinehurst***

STATUS OF BANKRUPTCY CASE

On January 10, 2019, the hearing was continued for holding purposes and as a continued status conference hearing.

We have made contact with the attorney in the debtor's criminal case, and he has communicated that the case hearing date was moved from January 14, 2019 to June 3, 2019, at which time the court will set a trial date. (See Declaration of Ethan A. Balogh.)

Therefore, the debtor would like to request that the status conference be continued to a hearing date after the criminal case hearing of June 3, 2019.

Dated: April 9, 2019

Anyama Law Firm

By: /s/Onyinye N. Anyama
Attorney for Debtor-in-Possession
Jinnie Chang Chao

DECLARATION OF ONYINYE N. ANYAMA

I Onyinye Anyama, declare as follows:

1. I am the Attorney at Law licensed to practice in the State of California and before this court. I am the attorney for the debtor in this case, and as such I have personal knowledge of the facts in this case.
2. This declaration is made in support of the Debtors Case Status Conference Report.
3. The debtor's real properties are located at :
 - 8108 Penobscot Ln. McKinney TX,
 - 701 Braxton Ct. McKinney TX,
 - 30 Pilarcitos Ct Hillsborough CA
 - 305 St Andrews Dr. Pinehurst NC
 - 9 Maverick Pl. Pinehurst
4. On January 10, 2019, the court continued the hearing for holding purposes. The continued hearing date is to be considered a status conference hearing.
5. On April 8, 2019, I contacted Ethan Balogh (the criminal case attorney) and he advised me that the criminal case was moved from January 14, 2019 to June 3, 2019, at which time the court would set a trial date.
6. I would like to request the court to continue the status conference hearing to be heard after the criminal case hearing scheduled for June 3, 2019.
7. The request to continue is also based on the fact that I will be out of the country from April 11, 2019-April 26, 2019.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: April 9, 2019

Respectfully Submitted,

/s/Onyinye N. Anyama

Onyinye N. Anyama

Attorney for Debtors-in-possession

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7 Attorney for Debtor and Debtor-in-Possession

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 In re:

Case No.: 15-31519

Chapter 11

11 JINNIE JINHUEL CHANG CHAO,

DECLARATION OF ETHAN A. BALOGH

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13 Debtor.

14 I, ETHAN A. BALOGH, declare:

15 1. I am the partner in the law firm of Coleman & Balogh LLP. I am a member of the State Bar
16 of California and am admitted to practice before the Northern District of California. I state the following on
17 personal knowledge and could competently testify on the matters stated in this declaration if called as a
18 witness.
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20 2. The attorney for the Debtor and Debtor-in-possession has asked me to provide the status of
21 the case captioned *United States v. Chao*, Case No. 16 Cr. 435 EJD, now pending in the Northern District of
22 California (San Jose Division). I report that the case is scheduled for a trial setting on June 3, 2019,
23 although that date is likely to be moved based on a scheduling conflict. The parties have addressed their
24 competing views of the case, and the defense is waiting for a substantive response from the Government,
25 and the Government is waiting for two additional documents from the defense, which I shall provide this
26 week. The Government is currently evaluating a presentation I made on April 5, 2019, and I expect a
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1 response towards the end of April or early May. In the absence of a change in position, the case is likely to
3 get set for trial at the next calling of the case, with trial scheduled for later in 2019 or early 2020.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct. Executed this 10th day of April 2019, at San Francisco, California.

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9 ETHAN A. BALOGH
10 Attorney at Law
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